REMARKS

Applicant respectfully requests consideration of the subject application as amended herein. This Amendment is submitted in response to the Office Action mailed October 20, 2005. Claims 1-5, 7-15, 17-19 and 21-24 stand rejected. In this Amendment, claims 1-8 and 10-23 have been amended, claim 9 has been cancelled and claims 25-37 have been added. No new matter has been added.

Objections to the Claims

The Examiner has objected to claims 2 and 10-18 because there was insufficient antecedent basis for various limitations in the claims. As indicated above, these claims have been amended to resolve the antecedent basis issues and define the claim limitations more clearly.

The Examiner objected to "the plurality of data sets" in claim 14 and "the header data" in claim 15. These limitations are referred to earlier in each of these claims (line 2 and line 4, respectively); thus, it is unclear why these limitations are being objected to.

Accordingly, Applicants respectfully request withdrawal of the claim objections.

35 U.S.C. § 112 Rejections

The Examiner has rejected claim 1 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

As indicated above, Applicants have amended claim 1 to clarify that the voice recognition unit is coupled to the speech processing server via a computer network, and the term processor and the phrase software modules are no longer used in claim 1.

Applicant, accordingly, respectfully requests withdrawal of the rejections of claim 1 under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

35 U.S.C. §§ 102 and 103 Rejections

The Examiner has rejected claims 1, 4, 8-10, 12, 14, 17-19, and 21 under 35 U.S.C. § 102(e) as being anticipated by Agnew, et al (U.S. Patent No. 6,950,745, hereinafter "Agnew"). The Examiner has rejected claims 2, 11, 13 and 22 under 35 U.S.C. § 103(a) as being unpatentable over Agnew in view of Segal, et al (U.S. Patent No. 6,836,651, hereinafter "Segal"). The Examiner has rejected claim 3 under 35 U.S.C. § 103(a) as being unpatentable over Agnew in view of Segal and further in view of Heck (U.S. Patent No. 6,671,672, hereinafter "Heck"). The Examiner has rejected claims 5 and 15 under 35 U.S.C. § 103(a) as being

unpatentable over Agnew in view of Cannell, et al (U.S. Patent No. 6,850,604, hereinafter "Cannell"). The Examiner has rejected claims 23 and 24 under 35 U.S.C. § 103(a) as being unpatentable over Agnew in view of MeLampy, et al (U.S. Patent No. 5,566,236, hereinafter "MeLampy").

Applicants do not admit that Agnew is prior art and reserve the right to swear behind this reference at a later date. Regardless, Applicants respectfully submit that the pending claims are patentable over the above reference.

Claim 1

Applicant respectfully submits Agnew fails to teach or suggest, inter alia, as required by claim 1:

> a voice recognition unit to receive user input via a telephone connection, the user input requesting an ad hoc query be performed against data stored by the enterprise data system using a spoken natural language query, to send query criteria corresponding to the ad hoc query request by the user to the enterprise data system, to receive data from the enterprise data system based on the query criteria, and to provide feedback data corresponding to data received from the enterprise data system in a verbal format to the user via the telephone connection; and

> a speech processing server, coupled to the voice recognition unit via a computer network, to determine the query criteria by converting the spoken natural language query into a data request in a text form and identifying one or more objects and data criteria corresponding to the spoken natural language query based on the data request.

In particular, Agnew does not teach or suggest at least identifying one or more object(s) and data criteria corresponding to the spoken natural language query based on the data request.

In fact, the Examiner has pointed to no teaching in Agnew for the above limitation.

Agnew discloses a call centre which accesses a number of databases to determine a route for a driver who calls the call centre. A direct query is made of the databases in the call centre.

In contrast, in the presently claimed invention, rather than accessing data through a direct query of the enterprise database, the user requests data to be retrieved by passing information that identifies data corresponding to the one or more objects to be retrieved from the database. This allows the system to determine where the data corresponding to the object(s) are stored in the enterprise database before the enterprise database is accessed. Since the objects and data criteria are first identified, there is a layer of abstraction so that the databases can be reconfigured while maintaining a consistent application interface for the users.

Claim 12

Applicant respectfully submits Agnew fails to teach or suggest, inter alia, as required by claim 12: "the voice recognition unit including a voice user interface to enable the user to navigate and query data from a plurality of

domains using spoken navigation and natural language query commands,

wherein each domain comprises data corresponding to a respective type of object

in the enterprise data system."

The Examiner has pointed to no teaching in Agnew for the above

limitation.

Agnew provides no teaching or suggestion that the user can navigate and

query data using spoken navigation and natural language query commands.

In contrast, in the presently claimed invention, the user can navigate and

query data using spoken navigation and natural language query commands.

Claim 18

Applicant respectfully submits Agnew fails to teach or suggest, inter alia,

as required by claim 18:

> a voice recognition unit to receive user input via a
> telephone connection, the user input requesting an ad
> hoc query be performed using a spoken natural
> language query, to retrieve data corresponding to the
> ad hoc query, and to provide feedback data
> corresponding to the retrieved data in a verbal format
> to the user via the telephone connection;
>
> a speech processing server, coupled to the voice
> recognition unit via a computer network, to convert a
> spoken natural language query into a data request;
> and
>
> a local database, coupled to the voice recognition unit
> and the speech processing server via the computer
> network, to store pre-compiled data in a form
> corresponding to a set of grammars comprising a
> language and syntax defining a format in which data
> are phonetically represented,

wherein the data is retrieved from at least one of the
enterprise data system and the local database.

In particular, Agnew does not teach <u>at least</u> storing pre-compiled data in a

local database that is apart from the enterprise data system or enabling the user

to request an ad hoc query be performed against data stored in the enterprise

data system and/or local database, etc. All of the information in Agnew is stored

in databases located at the navigation control centre.

In fact, the Examiner has pointed to no teaching in Agnew for the above

limitations.

In contrast, in the presently claimed invention, pre-compiled data can be

stored in a local database apart from the enterprise data system, and the user can

request that an ad hoc query be performed against data stored in either or both

the enterprise data system and the local database.

<u>Claim 21</u>

Applicant respectfully submits Agnew fails to teach or suggest, inter alia, as

required by claim 21:

> a voice recognition unit to receive user input via a
> telephone connection, to authenticate the user with
> the voice access system using a login process in which
> the user is identified by a unique user identifier, to
> enable the user to request to call a person or entity
> using a spoken command, to determine a telephone
> number for the person or entity through query of the
> enterprise data system in response to the spoken
> command, and to transfer the initial telephone
> connection to a new connection that connects the user

with the person or entity via the telephone number for the person or entity.

The Examiner has pointed to no teaching in Agnew for the above limitation.

Agnew only teaches that a user can contact the navigation control centre for driving directions. Agnew does not teach or suggest that the navigation control centre can enable a user to request to call a person or entity after being authenticated, locate the telephone number of such a person or entity and connect the user with such a person or entity via the telephone number.

In contrast, in the present invention, the system enables a user to request to call a person or entity, locates the telephone number of the person or entity and connects the user with such a person or entity via the telephone number.

Therefore, Agnew does not teach or suggest the claimed limitations of independent claims 1, 12, 18 and 21. Applicant, accordingly, respectfully requests withdrawal of the rejection of claims 1, 4, 8-10, 12, 14, 17-19, and 21 under 35 U.S.C. § 102(e) as being anticipated by Agnew.

Claims 2-5, 7-11, 13-15, 17, 19 and 22-24 depend, directly or indirectly, from one of the foregoing independent claims. Therefore, claims 2-5, 7-11, 13-15, 17, 19 and 22-24 are also patentable over the cited art. Applicant, accordingly, respectfully requests withdrawal of the rejections of claims 2-3, 5, 11, 13, 15 and 22-24 under 35 U.S.C. § 103(a).

Allowable Subject Matter

The Examiner has indicated that claims 6, 16 and 20 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants note the Examiner's indication of allowability of claims 6, 16 and 20.
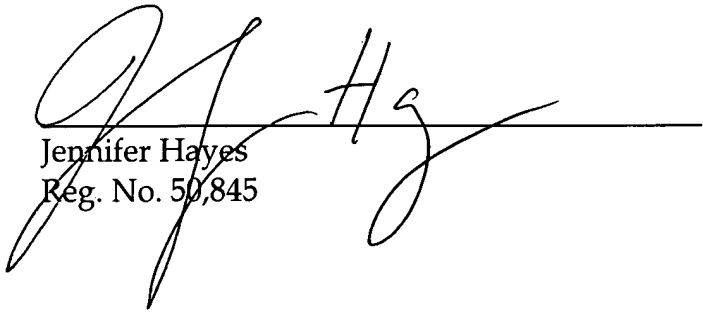
Applicant respectfully submits that the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Jennifer Hayes at (408) 720-8300.

Please charge any shortages and credit any overages to Deposit Account No. 02-2666. Any necessary extension of time for response not already requested is hereby requested. Please charge any corresponding fee to Deposit Account No. 02-2666.

Respectfully submitted,

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